

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

IN RE:

ACandS, Inc.,	Case No.: 02-12687 Docket No. 3728
Armstrong World Industries, Inc.,	Case No.: 00-4471 Docket No. 10789
Combustion Engineering, Inc.,	Case No.: 03-10495 Docket No. 3483
The Flintkote Company,	Case No.: 04-11300 Docket No. 7498
Kaiser Aluminum Corp.,	Case No.: 02-10429 Docket No. 10301
Owens Corning,	Case No.: 00-3837 Docket No. 21075
US Mineral Products Company,	Case No.: 01-2471 Docket No. 3996
USG Corp.,	Case No.: 01-2094 Docket No. 12689
W.R. Grace & Co.,	Case No.: 01-1139 Docket No. 30490
Debtors.	

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:

Mid-Valley, Inc.	Case No.: 03-35592 Docket Nos. 2846
North American Refractories Co.	Case No.: 02-20198 Docket Nos. 7881
Pittsburgh Corning Corp.	Case No.: 00-22876 Docket Nos. 9299
Debtors.	

**STATEMENT OF COUNSEL TO CERTAIN LAW FIRM OBJECTORS
REGARDING IDENTIFICATION OF SPECIAL MASTER**

The undersigned counsel represents the following law firms: Kazan, McClain,
Lyons, Greenwood & Harley, Waters & Kraus LLP, Simmons Browder Gianaris Angelides &

Barnerd LLC, Bergman, Draper & Frockt, Gori Julian, & Associates, P.C., Early, Lucarelli, Sweeney & Strauss, Cooney & Conway, Lipsitz & Ponterio, LLC, Bifferato LLC, and Montgomery, McCracken, Walker & Rhoads, LLP (the “Certain Law Firm Objectors”). Furthermore, the undersigned counsel is authorized to file this statement on behalf of the law firms represented by Stutzman Bromberg Esserman & Plifka, and the four Asbestos Claimants’ Committees represented by Caplin & Drysdale (collectively with the Certain Law Firm Objectors, the “Lead Objectors”).

As the Court is aware, the Lead Objectors participated in the litigation resulting from Garlock Sealing Technologies LLC’s (“Garlock”) motion for access to exhibits filed pursuant to Fed. R. Bank. P. 2019 in the twelve above-captioned asbestos bankruptcy cases.

On April 9, 2013, the Court filed its Order Establishing the Protocol for Production of 2019 Exhibits (Case No. 00-03837-JKF, D.I. 21075) (the “Protocol Order”).

Paragraph 23 of the Protocol Order provided that “Garlock shall review the WDPA Special Master Panel and, after consultation the parties to the DOD and PAWB appeals identified in paragraph 4, above, and by April 8, 2013, Garlock shall recommend a Pittsburgh-based Special Master to undertake the 2019 Exhibit Production.”

On April 8, 2013, counsel to Garlock provided a letter to the Court identifying Messrs. Robert Bernstein, Karl Schieneman and David White as potential special masters under the Protocol Order (the “Potential Special Masters”).

Contrary to the requirements of paragraph 23 of the Protocol Order, counsel for Garlock did not consult with the Lead Objectors prior to identifying the Proposed Special Masters.

On April 9, 2013, the undersigned counsel contacted counsel to Garlock to begin a dialogue of behalf of the Lead Objectors regarding the Proposed Special Masters.

On April 10, 2013, the undersigned counsel also contacted the Court's chambers to inform the Court that the parties would meet and confer regarding the Proposed Special Masters.

The undersigned counsel, on behalf of the Lead Objectors, respectfully requests that the Court briefly defer appointment of a special master until the parties can report back to the Court promptly following their meet and confer regarding the Proposed Special Masters.

Respectfully submitted,

Dated: April 10, 2013

/s/ Natalie D. Ramsey
Natalie D. Ramsey (DE Bar No. 5378)
Davis Lee Wright (DE Bar No. 4324)
MONTGOMERY, MCCracken,
WALKER & RHOADS, LLP
1105 North Market Street, Suite 1500
Wilmington, DE 19801
Telephone: (302-504-7830)
Facsimile: (302-504-7820)

Counsel to Certain Law Firm Objectors